

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA,  
INC., SAMSUNG DISPLAY CO., LTD.,

*Defendants.*

Civil Action No. 2:23-cv-00103-JRG-RSP

**JURY DEMANDED**

**PLAINTIFF HEADWATER RESEARCH LLC'S  
NOTICE OF DISMISSAL WITHOUT PREJUDICE**

Plaintiff Headwater Research LLC, pursuant to Federal Rule of Civil Procedure 41(a), hereby moves to dismiss all claims between Plaintiff and Defendant Samsung Display Co., Ltd. ("Samsung Display") without prejudice, with each party to bear its own costs, expenses and attorneys' fees. Samsung Display has not yet filed an answer or counterclaims. The parties agree that this dismissal does not count against the two-dismissal rule under FRCP 41(a)(1)(B).

Date: June 1, 2023

/s/ Marc Fenster

Marc Fenster

CA State Bar No. 181067

Reza Mirzaie

CA State Bar No. 246953

Brian Ledahl

CA State Bar No. 186579

Ben Wang

CA State Bar No. 228712

Paul Kroeger

CA State Bar No. 229074

Neil A. Rubin

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Kristopher Davis

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James S. Tsuei  
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Philip Wang  
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Amy Hayden  
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**ATTORNEYS FOR PLAINTIFF,  
Headwater Research LLC**

**CERTIFICATE OF SERVICE**

I certify that this document is being served upon counsel of record for Defendants on June 1, 2023 via ECF.

/s/ Marc Fenster  
Marc Fenster